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November 20, 2023

**VIA ECF**

The parties' request is GRANTED and the proposed schedule is adopted. The Clerk of Court is directed to terminate the motion at ECF No. 21.

Hon. Arun Subramanian, U.S.D.J.  
United States District Court, S.D.N.Y.  
500 Pearl Street, Courtroom 15A  
New York, New York 10007

SO ORDERED.



Arun Subramanian, U.S.D.J.

Date: November 20, 2023

**Re: The Travelers Indemnity Co. of Am. v. Ohio Security Ins. Co.**  
**Civil Action No.: 1:23-cv-03451-AS**

Dear Judge Subramanian:

Our firm represents defendant Ohio Security Insurance Company in the above-entitled action. We submit this letter pursuant to Your Honor's Individual Practice Rules to request an extension of the motion for summary judgment schedule by 30 days. The old scheduled and proposed new schedule is as follows:

<b><u>Papers</u></b>	<b><u>Old Schedule</u></b>	<b><u>Proposed New Schedule</u></b>
Def Moving	November 20, 2023	December 20, 2023
Plt Opposition and X-Motion	December 4, 2023	January 11, 2024
Def Opposition and Reply	December 13, 2023	January 18, 2024
Plt Reply	December 20, 2023	January 25, 2024

There have been no prior adjournments of this motion schedule. The reason for the adjournment request is that the parties have been getting themselves in position for making the motions. In addition, it would be a waste of both the parties and judicial resources to have a trial on issues that would be more expeditiously and cost effectively decided on paper. Plaintiff's counsel consents and joins into this request. There are no scheduled conferences or other deadlines in this matter.

We appreciate the Court's attention to this matter.

Respectfully submitted,

  
Marshall T. Potashner

cc: Rachel Fain, Esq. (via ECF)